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February 22, 2006



VIA HAND DELIVERY

Ms. Debra A. Howland
Executive Director and Secretary
New Hampshire Public Utilities Commission
21 S. Fruit Street, Suite 10
Concord, NH 03301

**Re: DT 06-012: Verizon New Hampshire's
Proposed Revisions to NH PUC Tariff No. 84**

**DT 05-083: Verizon New Hampshire
Wire Center Investigation**

Dear Ms. Howland:

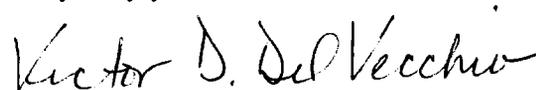
Enclosed for filing in the above-consolidated dockets, please find a copy of an Industry Notice that was sent via U.S. mail to CLECs and posted on Verizon's Wholesale Website today. This notice clarifies an earlier Industry Notice dated February 3, 2006, which had updated Verizon's initial non-impaired wire center list to exclude from consideration fiber-based collocation arrangements established by MCI or its affiliates in any Verizon wire center.

The clarification was prompted because some CLECs were confused about the effect of the changes Verizon had announced in its February 3, 2006 notice, in particular whether those changes were "retroactive" to the March 11, 2005 effective date of

Verizon's initial wire center list.¹ To eliminate any doubt, consistent with the voluntary commitments Verizon made in connection with the FCC's approval of the Verizon/MCI merger, Verizon reiterates for the parties' benefit that the changes in the wire center classifications that took effect on February 3, 2006 were prospective only, and have no retroactive effect.²

Thank you for your attention to this matter.

Very truly yours,



Victor D. Del Vecchio

cc: Service List

¹ For example, in their joint comments filed on February 17, 2006, BayRing and segTEL appear to rely on a letter and attachment that Verizon filed with Mr. Thomas Nevin, Chief of the FCC's Wireline Competition Bureau, dated February 3, 2006, to conclude that changes Verizon voluntarily agreed to make to its wire center classifications (to exclude MCI or its affiliates from the list of fiber-based collocators in non-impaired wire centers) take "effect retroactively to March 11, 2005." See BayRing/segTEL Comments at 14. BayRing/segTEL's conclusion is wrong.

BayRing/segTEL (at pages 30-31) also mischaracterizes Verizon's FCC merger commitment regarding increases in certain rates. The commitment pertained to unbundled network elements ("UNEs") and *not* to arrangements that the FCC has now determined need not be made available as UNEs, such as high-capacity loops and transport between non-impaired wire centers. See Verizon's October 31, 2005 FCC letter at 2 attached as Appendix B to BayRing/segTEL's Comments ("For a period of two years, beginning on the Merger Closing Date, Verizon's incumbent local telephone companies will not seek any increase in state-approved rates for unbundled network elements (UNEs) that are currently in effect...." Footnote omitted.).

² See page 9 of Verizon NH's Comments dated February 17, 2006, where Verizon NH explained that its voluntary FCC commitment, to exclude MCI as a fiber-based collocator in non-impaired wire centers, applies on a prospective basis.

Interconnection Services Policy & Planning



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February 21, 2006

Subject: CLARIFICATION REGARDING FEBRUARY 3, 2006 NOTICE REGARDING CHANGES TO WIRE CENTER CLASSIFICATIONS

In accordance with voluntary commitments made by Verizon Communications Inc. ("Verizon") in connection with the FCC's approval of the Verizon/MCI Merger,¹ within thirty days after the Merger Closing Date, Verizon agreed to issue an update to its initial non-impaired wire center list (*i.e.*, the list that took effect on 3/11/05) that, in applying the criteria established by the FCC in the *TRO Remand Order*,² would exclude from consideration fiber-based collocation arrangements established by MCI or its affiliates in any of Verizon's wire centers. The Verizon/MCI Merger closed on January 6, 2006, and Verizon made its compliance filing of a revised wire center list in fulfillment of this commitment on February 3, 2006.

On February 3, 2006, Verizon sent notices of these changes to the wire center list directly to CLECs, posted this information on its Wholesale website, and advised CLECs that effective on that date,³ the revised wire center list attached as Exhibit A to that notice replaced Verizon's initial wire center list that had taken effect on March 11, 2005.⁴ See Industry Notice Regarding Changes to Wire Center Classifications (February 3, 2006).

It has come to Verizon's attention that some CLECs were confused about the effect of the changes Verizon announced on February 3, 2006 – in particular, whether those changes were "retroactive" to the March 11, 2005 effective date of Verizon's initial wire center list.⁵ To eliminate any doubt, consistent with the above-

1 See Letter from Susanne A. Guyer, Verizon, to Jeffrey J. Carlisle, FCC, WC Docket No. 04-313 and CC Docket No. 01-338 (filed Feb. 18, 2005); Letter from Edwin J. Shimizu, Verizon, to Marlene H. Dortch, FCC, WC Docket No. 04-313 and CC Docket No. 01-338 (filed Mar. 4, 2005); Letter from Edwin J. Shimizu, Verizon, to Michelle Carey, FCC, WC Docket No. 04-313 and CC Docket No. 01-338 (filed Apr. 15, 2005).

2 Order on Remand in WC Docket No. 04-313 and CC Docket No. 01-338 released on February 4, 2005 (the "*TRO Remand Order*").

3 In those states such as New York and Rhode Island, which require that changes to wire center classifications be implemented pursuant to a state tariff, the changes reflected in Exhibit A will take effect upon the effective date of tariff revisions reflecting those changes. Verizon has already filed tariff revisions to reflect these changes in New York and Rhode Island.

4 As detailed in the Verizon November 17, 2005 Notice of Updates to Verizon Wire Center Classifications and the January 26, 2006 Industry Letter reminder, Verizon has identified additional wire centers, based on updated data, that meet the FCC's non-impairment criteria (the "November 17 Additional Wire Centers"). Such updates will take effect on February 15, 2006. Because, as described in the November 17, 2005 notice, the fiber-based collocators counts used to determine the November 17 Additional Wire Centers already reflected Verizon's affiliation with MCI, the February 3, 2006 revision did not affect the November 17 Additional Wire Centers.

5 This confusion arose in part from a header on the list of non-impaired wire centers attached to the February 3, 2006 Notice which read "Effective March 11, 2005 – Last updated 2/3/06 to reflect status as of 3/11/05." The header has been corrected, and a corrected

described merger commitment, the changes in wire center classifications that took effect on February 3, 2006 were prospective only, and had no retroactive effect. Therefore, circuits that CLECs obtained prior to February 3, 2006 will continue to be subject to the wire center classifications detailed in Verizon's initial wire center list, published on March 2, 2005 (as amended April 15, 2005) for the time period covering March 11, 2005 through February 2, 2006.⁶ See Industry Letter – Publication of Verizon Wire Center Information (March 2, 2005). Attached please find a corrected revised wire center list that supersedes the one distributed on February 3, 2006 to further clarify that the effective date of the revisions to the wire center classifications contained in that list are effective on and after February 3, 2006.

version of the February 3, 2006 revised wire center list is attached as Exhibit A. No other revisions have been made to the attached list.

⁶ For example, if prior to February 3, 2006, a CLEC had an embedded base of dedicated DS3 transport circuits between wire centers that were initially classified as Tier 2 wire centers, but that as of February 3, 2006 are classified as Tier 3 wire centers, those circuits are subject to the 15% transition surcharge provided by the FCC in 47 C.F.R § 15.319(e)(2)(iii)(C) for the period covering March 11, 2005 through February 2, 2006, but not thereafter. In addition, if a CLEC obtained, for example, a dedicated DS3 transport circuit ordered pursuant to an interstate or intrastate access tariff after March 11, 2005 between two wire centers that were initially classified as Tier 2 wire centers, but that as of February 3, 2006 are classified as Tier 3 wire centers, that circuit would not be entitled to unbundled network element rates for any portion of the period covering March 11, 2005 through February 2, 2006. On and after February 3, 2006, any circuits that have changed status from "non-impaired" to "impaired" by reason of the February 3, 2006 wire center reclassifications may, at the carrier's written request and subject to the terms of any term or volume plans, contract tariff, or other tariffed arrangement, or conversion charges (including without limitation, termination liability, shortfall penalties, and other charges set forth in an access tariff or an interconnection agreement) applicable to those circuits, be converted to unbundled network elements. Circuits ordered with provisioning dates on or after February 3, 2006 in wire centers classified as "impaired" by reason of the February 3, 2006 wire center reclassifications may be ordered as unbundled network elements or as special access services at the carrier's option. Please note that any illustrative examples or other discussion set forth herein should not be interpreted to expand Verizon's obligations or CLECs' rights as to matters beyond the scope of this notice (e.g., any conversion of a dedicated transport circuit to UNE under the example set forth above would be subject to the cap on the number of UNE dedicated transport circuits that CLECs may obtain on a given route under the *TRO Remand Order*, any EEL circuits remain subject to certification requirements, etc.).

Exhibit A

Verizon's Wire Centers Exempt from UNE Hi-Cap Loop and Dedicated Transport Ordering

Effective on and after 2/3/06, this list supersedes the list that was effective from 3/11/05 through 2/2/06

Pursuant to a notice regarding the status of certain Verizon wire center classifications in Massachusetts and Pennsylvania following the Verizon/MCI merger, submitted to CLECs on 2/2/06 via an Industry Letter, two Wire Centers, BRYMPABM in PA and NWTNMAWA in MA, that were removed from the filing made at the FCC in compliance with Verizon's merger commitments, have been reinstated on this list since those wire centers qualify for Tier 2 status based on updated information.

Transport (Unbundled Dedicated Transport + Unbundled Dedicated Transport portion of a Loop-Transport combination)

DS1 Unbundled Transport will not be offered between Wire Center CLLIs marked "Yes" in the Tier 1 column.

DS3 Unbundled Transport and Dark Fiber will not be offered between Wire Center CLLIs marked "Yes" in *either* the Tier 1 or Tier 2 columns.

Loop (Unbundled Loop + Unbundled Loop portion of a Loop-Transport combination)

DS1 Unbundled Loop Services will not be offered from Wire Centers marked "Yes" in the DS1 Loop column. DS3 Unbundled Loop Services will not be offered from Wire Centers marked "Yes" in the DS3 Loop column.

Wire Center Qualified w/o MCI - Yes or No - 02/03/06						
Operated State	Wire Center	Tier 1	Tier 2	DS1 Loop	DS3 Loop	
CA	BLPKCAXF	No	Yes	No	No	
	CCMNCAXF	No	Yes	No	No	
	LNBHCAXF	Yes	No	No	No	
	LNBHCAXS	No	Yes	No	No	
	SNBBCAXF	No	Yes	No	No	
	SNMNCAXG	No	Yes	No	No	
	SNMNCAXP	No	Yes	No	No	
	THOKCAXF	No	Yes	No	No	
	WLANCAXF	No	Yes	No	No	
	WLANCAXH	No	Yes	No	No	
	WMNSCAXF	Yes	No	No	No	
	CT	GNWCCTGN	Yes	No	No	No
	DC	WASHDCDN	Yes	No	Yes	Yes
WASHDCDP		Yes	No	No	No	
WASHDCMO		Yes	No	Yes	Yes	
WASHDCMT		Yes	No	Yes	Yes	
WASHDCSW		Yes	No	Yes	Yes	
DE	WASHDCWL	No	Yes	No	No	
	DOVRDEDV	No	Yes	No	No	
	NWRKDENB	Yes	No	No	No	
FL	WLMGDEWL	Yes	No	No	No	
	BHPKFLXA	Yes	No	No	No	
	CLWRFLXA	Yes	No	No	No	
	CNSDFLXA	No	Yes	No	No	

	PNLSFLXA	No	Yes	No	No
	SPBGFLXA	Yes	No	No	No
	SRSTFLXA	No	Yes	No	No
	SWTHFLXA	Yes	No	No	No
	TAMPFLXA	Yes	No	No	No
	TAMPFLXE	Yes	No	No	No
	TAMPFLXX	Yes	No	No	No
	WSSDFLXA	Yes	No	No	No
	YBCTFLXA	No	Yes	No	No
HI	HNLLHIMN	Yes	No	No	No
IN	FTWYINXA	No	Yes	No	No
MA	BKLIMAMA	No	Yes	No	No
	BRNTMAWA	No	Yes	No	No
	BRTNMACR	Yes	No	No	No
	BSTNMABE	Yes	No	Yes	Yes
	BSTNMABO	Yes	No	No	Yes
	BSTNMAFR	Yes	No	No	No
	BSTNMAHA	Yes	No	No	Yes
	BURLMABE	No	Yes	No	No
	CMBRMABE	Yes	No	No	No
	CMBRMAWA	Yes	No	Yes	Yes
	DNVSMABI	Yes	No	No	No
	FRMNMAUN	Yes	No	No	No
	HLKYMAMA	No	Yes	No	No
	LWLLMAAP	Yes	No	No	No
	LWRNMACA	Yes	No	No	No
	LXTNMAWA	No	Yes	No	No
	MLDNMAEL	No	Yes	No	No
	MRBOMAMA	Yes	No	No	No
	NATNMAMA	No	Yes	No	No
	NWTNMAWA	No	Yes	No	No
	QNCYMAHA	Yes	No	No	No
	SALMMANO	Yes	No	No	No
	SOVLMACE	Yes	No	No	No
	SPFDMAWO	Yes	No	No	Yes
	WLHMMASP	Yes	No	No	No
	WLHMMawe	Yes	No	No	No
	WRCSMACE	Yes	No	No	Yes
MD	BLTMMDCH	Yes	No	Yes	Yes
	BLTMMDWL	Yes	No	No	No
	BTHSMDRP	Yes	No	No	No
	CHCHMDBE	Yes	No	No	Yes
	CLMAMDCB	No	Yes	No	No
	FPATMDFR	No	Yes	No	No
	FRDRMDFR	Yes	No	No	No
	GMTWMDGN	No	Yes	No	No
	GTBGMDGB	Yes	No	No	No
	HGTWMDHG	No	Yes	No	No

	LARLMDLR	No	Yes	No	No
	RKVLMDMR	Yes	No	No	No
	RKVLMDRV	Yes	No	No	No
	SLBRMDSB	Yes	No	No	No
	SLSPMDSS	Yes	No	No	Yes
	TWSNMDTW	No	Yes	No	No
	WHTNMDWT	No	Yes	No	No
ME	BNGRMEPA	No	Yes	No	No
	LSTNMEAS	No	Yes	No	No
	PTLDMEFO	Yes	No	No	Yes
NC	DRHMNCXE	Yes	No	No	No
	DRHMNCXM	Yes	No	No	No
NH	DOVRNHTH	No	Yes	No	No
	KEENNHWA	Yes	No	No	No
	MNCHNHCO	Yes	No	No	Yes
	NASHNHWP	Yes	No	No	No
	PTMONHIS	Yes	No	No	No
NJ	ATCYNJAC	No	Yes	No	No
	CMDNNJCE	Yes	No	No	No
	ELZBNJEL	Yes	No	No	No
	ENWDNJEN	No	Yes	No	No
	EORNNJEO	No	Yes	No	No
	FRFDNJFA	No	Yes	No	No
	HCKNNJHK	Yes	No	No	Yes
	HOLMNJHO	No	Yes	No	No
	JRCYNJBR	Yes	No	No	No
	JRCYNJJO	Yes	No	No	Yes
	MRTWNJMR	Yes	No	No	Yes
	MSTWNJMO	No	Yes	No	No
	NBRGNJNB	No	Yes	No	No
	NBWKNJNB	Yes	No	No	Yes
	NWPVNMJH	No	Yes	No	No
	NWRKNJ02	Yes	No	Yes	Yes
	NWRKNJIR	No	Yes	No	No
	PLFDNJPF	No	Yes	No	No
	PNNKNJPN	No	Yes	No	No
	PSSCNJPS	Yes	No	No	No
	PSVLNJPL	No	Yes	No	No
	PSWYNJPI	No	Yes	No	No
	PTSNNJAR	No	Yes	No	No
	RCPKNJ02	Yes	No	No	No
	RDBKNJRB	No	Yes	No	No
	RTFRNJRU	Yes	No	No	No
	SOVLNJSM	No	Yes	No	No
	TMRVNJTR	No	Yes	No	No
	TRENNJTE	Yes	No	No	No
	UNCYNJ02	Yes	No	No	Yes
	WHIPNJWH	No	Yes	No	No

NY	ALBYNYSS	Yes	No	No	No
	AMHRNYMP	Yes	No	No	No
	BFLONYEL	No	Yes	No	No
	BFLONYFR	Yes	No	No	Yes
	BFLONYHE	Yes	No	No	No
	BFLONYMA	No	Yes	No	No
	BRWDNYBW	Yes	No	No	Yes
	FLPKNYFP	No	Yes	No	No
	FRDLNYFM	No	Yes	No	No
	GRCYNYGC	Yes	No	Yes	Yes
	HCVLNYHV	No	Yes	No	No
	LYBRNYLB	Yes	No	No	No
	MINLNYMI	Yes	No	No	Yes
	NYCKNY77	No	Yes	No	No
	NYCKNYBR	Yes	No	Yes	Yes
	NYCKNYWM	Yes	No	No	No
	NYCMNY13	Yes	No	Yes	Yes
	NYCMNY18	Yes	No	Yes	Yes
	NYCMNY30	Yes	No	Yes	Yes
	NYCMNY36	Yes	No	Yes	Yes
	NYCMNY37	Yes	No	Yes	Yes
	NYCMNY42	Yes	No	Yes	Yes
	NYCMNY50	Yes	No	Yes	Yes
	NYCMNY56	Yes	No	Yes	Yes
	NYCMNY73	Yes	No	No	No
	NYCMNY79	Yes	No	No	Yes
	NYCMNY97	Yes	No	No	No
	NYCMNYBS	Yes	No	Yes	Yes
	NYCMNYVS	Yes	No	No	Yes
	NYCMNYWS	Yes	No	Yes	Yes
	NYCQNYFL	No	Yes	No	No
	NYCQNYJA	Yes	No	No	No
	NYCQNYLI	Yes	No	No	No
	NYCQNYNW	No	Yes	No	No
	NYCRNYNS	No	Yes	No	No
	NYCXNYTR	No	Yes	No	No
	SCHNNYSC	No	Yes	No	No
	SYRCNYSU	Yes	No	No	Yes
	WHPLNYWP	Yes	No	No	Yes
	WSNCNYUN	No	Yes	No	No
	WSVLNYNC	Yes	No	No	No
OR	BVTNORXB	Yes	No	No	No
	SMRWORXA	No	Yes	No	No
	TGRDORXA	Yes	No	No	No
PA	ALTWPAAL	Yes	No	No	No
	AMBLPAAM	No	Yes	No	No
	ARMRPAAR	Yes	No	No	No
	BCYNPABC	Yes	No	No	No

	BHLHPABE	Yes	No	No	No
	BLLVPABE	No	Yes	No	No
	BRYMPABM	No	Yes	No	No
	CARNPACA	Yes	No	No	No
	CNSHPACN	Yes	No	No	No
	CPHLPACH	Yes	No	No	No
	CRAFPACR	Yes	No	No	No
	CRPLPACO	Yes	No	No	No
	DRMTPADO	Yes	No	No	No
	GLNSPAGL	No	Yes	No	No
	GNBGPAGR	No	Yes	No	No
	HRBGPAHA	Yes	No	No	No
	HTBOPAHB	Yes	No	No	No
	KGPRPAKP	Yes	No	No	No
	LNCSPALA	Yes	No	No	No
	MBRGPAME	No	Yes	No	No
	MOVLPAMO	Yes	No	No	No
	NRTWPANR	Yes	No	No	No
	OKMTPAOA	No	Yes	No	No
	PAOLPAPA	Yes	No	No	No
	PEHLPAPH	No	Yes	No	No
	PHLAPAEV	Yes	No	No	Yes
	PHLAPALO	Yes	No	Yes	Yes
	PHLAPAMK	Yes	No	Yes	Yes
	PHLAPAPE	Yes	No	No	No
	PHLAPAPI	No	Yes	No	No
	PHLAPATR	Yes	No	No	No
	PITBPAAL	Yes	No	No	No
	PITBPACA	No	Yes	No	No
	PITBPADT	Yes	No	Yes	Yes
	PITBPAEL	No	Yes	No	No
	PITBPANS	Yes	No	No	No
	PITBPAOK	Yes	No	No	No
	PYVLPAPE	Yes	No	No	No
	RBTTPART	Yes	No	No	No
	RDNGPARE	No	Yes	No	No
	SCTNPASC	Yes	No	No	No
	SHSAPASH	Yes	No	No	No
	STCGPAES	Yes	No	No	No
	SWKYPASE	No	Yes	No	No
	TRCKPATC	Yes	No	No	No
	WAYNPAWY	Yes	No	No	No
	WCHSPAWC	No	Yes	No	No
	WKBGPAWK	Yes	No	No	No
	WLBPAWB	No	Yes	No	No
	WLPTPAWI	No	Yes	No	No
RI	CNTNRIPH	No	Yes	No	No
	PRVDRIBR	Yes	No	No	No

	PRVDRIWA	Yes	No	No	Yes
	WNSCRICL	Yes	No	No	No
	WRWKRIWS	Yes	No	No	No
TX	CLSTTXXA	No	Yes	No	No
	DNTNTXXA	No	Yes	No	No
	IRNGTXXA	Yes	No	No	No
	IRNGTXXC	No	Yes	No	No
	IRNGTXXD	No	Yes	No	No
	IRNGTXXG	Yes	No	No	No
	PLANTXXA	Yes	No	No	No
	PLANTXXB	No	Yes	No	No
	PLANTXXD	No	Yes	No	No
VA	ALXNVAAAX	No	Yes	No	No
	ALXNVABA	Yes	No	No	No
	ARTNVAAR	Yes	No	No	Yes
	ARTNVACY	No	Yes	No	No
	CNVIVACT	Yes	No	No	No
	FLCHVAMF	No	Yes	No	No
	FRFXVAFF	Yes	No	No	Yes
	HRNDVAHE	Yes	No	Yes	Yes
	MCLNVALV	Yes	No	Yes	Yes
	MNSSVAXA	No	Yes	No	No
	NRFLVABS	Yes	No	No	No
	PNTGVADF	No	Yes	No	No
	RCMDVAGR	Yes	No	No	No
	RCMDVAPE	No	Yes	No	No
	RCMDVASR	No	Yes	No	No
	RONKVALK	No	Yes	No	No
	VINNVAVN	Yes	No	No	No
	VRBHVACC	Yes	No	No	No
VT	BURLVTMA	No	Yes	No	No
WA	BOTHWAXB	No	Yes	No	No
	RDMDWAXA	Yes	No	No	No
WV	CHTNWVLE	Yes	No	No	No
Total Qualified WCs		152	98	25	49